

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
Newark Division

UNITED STATES OF AMERICA)	
)	Case No. 2:21-cr-15
v.)	
)	Hon. Stanley R. Chesler
MARIA SUE BELL,)	
)	
Defendant.)	
)	

REPLY IN SUPPORT OF
EMERGENCY MOTION FOR RECONSIDERATION

Maria Sue Bell, through counsel, hereby replies to the government's Opposition to the Emergency Motion for Reconsideration. According to the government, the defense "presents nothing to change" the Court's conclusion that no set of conditions can reasonably assure Ms. Bell's appearance in Court or the safety of the community. ECF No. 9 at 3. We respectfully disagree. We have attempted to respond to the Court's comments at the last hearing. The people who know Ms. Bell best, her two sons and her partner, are willing to put all their assets on the line as secured collateral, on top of a \$100,000 unsecured bond, to assure the Court of Ms. Bell's appearance at trial. In addition, Ms. Bell is willing to put up the equity in her home and her own vehicle as secured collateral, which constitutes everything she owns. Ms. Bell therefore knows that if she were to disobey the Court's commands—something there is no actual indication she would do, given the

absence of even a traffic violation in her past, her long history of steady employment, her adoration of her adult children and infant grandson, her love of her partner, and the profound kindness she has shown throughout her life—both she and her family would be ruined. In addition, Ms. Bell’s partner has agreed to allow Pretrial Services to monitor his personal computer, to assure the Court that Ms. Bell only uses it for a narrowly prescribed range of activities necessary for legal representation. The defense submits that these conditions are sufficient to reasonably assure the Court that Ms. Bell will obey its commands.

The reasons for keeping Ms. Bell detained have changed at each bond hearing in this case. Each time, the defense has made a good-faith attempt to satisfy the Court’s concerns. Her children and her partner remain willing to answer any additional questions that the Court may have, under penalty of perjury. We respectfully ask the Court to grant the Emergency Motion for Reconsideration.

Respectfully submitted,

MARIA SUE BELL
By Counsel

/s/ Rahul Sharma, AFD
Office of the Federal Public Defender
1002 Broad Street
Newark, NJ 07302
(973) 320-7350
Rahul_Sharma@fd.org